

1 Albert N. Kennedy, OSB No. 821429 (Lead Attorney)

Direct Dial: 503.802.2013

2 Facsimile: 503.972.3713

E-Mail: albert.kennedy@tonkon.com

3 Michael W. Fletcher, OSB No. 010448

Direct Dial: (503) 802-2169

4 Facsimile: (503) 972-3867

E-Mail: michael.fletcher@tonkon.com

5 Ava L. Schoen, OSB No. 044072

Direct Dial: (503) 802-2143

6 Facsimile: (503) 972-3843

E-Mail: ava.schoen@tonkon.com

7 Danny Newman, OSB No. 200518

Direct Dial: (503) 802-2089

8 Facsimile: (503) 274-8779

E-Mail: danny.newman@tonkon.com

9 TONKON TORP LLP

888 SW Fifth Avenue, Suite 1600

10 Portland, OR 97204-2099

11 Attorneys for Debtors

12
13 UNITED STATES BANKRUPTCY COURT

14 DISTRICT OF OREGON

15 In re

16 North Pacific Cannery & Packers, Inc.,
17 Hermiston Foods, LLC, and NPCP Quincy,
18 LLC,

19 Debtors.

Case No. 19-62584-pcm11

LEAD CASE

(Jointly Administered with Case
Nos. 19-33102-pcm11 and
19-33103-pcm11)

**DEBTORS' FIFTH OMNIBUS
OBJECTION TO CLAIMS
(SATISFIED, NON-DEBTOR,
UNTIMELY, AND REDUCED
CLAIMS)**

20
21 **NOTICE OF OBJECTION**

22
23 If you oppose the proposed course of action or relief sought in this motion, you
24 must file a written objection with the Bankruptcy Court no later than 30 days after the service
25 date of this motion. If you do not file an objection, the Court may grant the motion without
26 further notice or hearing. Your objection must set forth the specific grounds for objection and

1 your relation to the case. The objection must be received by the Clerk of the Court at the United
2 States Bankruptcy Court, 405 E. Eighth Avenue, Suite 2600, Eugene, OR 97401 by the deadline
3 specified above or it may not be considered. At the same time, you must also serve the objection
4 on Michael W. Fletcher at Tonkon Torp LLP, 888 SW Fifth Avenue, Suite 1600, Portland, OR
5 97204. If the Court sets a hearing, you will receive a separate notice listing the hearing date,
6 time, and other relative information.

7 **OBJECTION**

8 North Pacific Cannery & Packers, Inc. (formerly known as NORPAC Foods, Inc.)
9 (“NORPAC”), Hermiston Foods, LLC, and NPCP Quincy, LLC (formerly known as Quincy
10 Foods, LLC), debtors and debtors-in-possession (“Debtors”), pursuant to 11 U.S.C. § 502 and
11 Rule 3007 of the Federal Rules of Bankruptcy Procedure, and the Order Granting Omnibus
12 Claim Objection Procedures and Settlement Procedures [ECF No. 826], file this fifth omnibus
13 objection (the “Objection”) to those claims listed on **Schedules 1, 2, 3, and 4** to the proposed
14 order (attached hereto as **Exhibit 1**), and submit in support of this Objection the Declaration of
15 William L. White of SierraConstellation Partners, attached hereto as **Exhibit 2** (the “White
16 Declaration”). In support of this Motion, Debtors respectfully state as follows:

17 **JURISDICTION AND VENUE**

18 1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1334
19 and 157. This matter is a core proceeding pursuant to 28 U.S.C. §§ 157(b)(2)(A) and (O).
20 Venue of this proceeding is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

21 2. The statutory bases for the relief requested herein are 11 U.S.C. § 502 and
22 Rule 3007 of the Federal Rules of Bankruptcy Procedure.

23 **BACKGROUND**

24 3. On August 22, 2019 (the “Petition Date”), Debtors filed voluntary
25 petitions for relief under Chapter 11 of Title 11 of the United States Code.
26

1 4. On August 26, 2019, the Court entered an Order Directing Joint
2 Administration Pursuant to FRBP 1015(b) of each of Debtors' cases.

3 5. No request has been made for the appointment of a trustee or examiner.
4 An official committee of unsecured creditors (the "Committee") was appointed in Debtors' cases
5 on August 30, 2019.

6 6. The Notice of Chapter 11 Bankruptcy Case, entered in each of Debtors'
7 cases on August 27, 2019, established October 31, 2019 as the general deadline by which proofs
8 of claim must be received by Kurtzman Carson Consultants LLC ("KCC"), Debtors' official
9 court-appointed notice and claims agent, in each of Debtors' Chapter 11 cases (the "General Bar
10 Date") and also identified February 18, 2020 as the claims bar date applicable to governmental
11 units pursuant to FRBP 3002(c)(1) (the "Government Bar Date" and, together with the General
12 Bar Date, the "Initial Bar Dates").

13 7. On September 17, 2019, each of Debtors filed a Statement of Financial
14 Affairs and a Schedule of Assets and Liabilities in their respective cases.

15 8. On February 25, 2020, the U.S. Trustee appointed the Unsecured
16 Committee of Co-Op Member Produce Suppliers (the "Growers Committee"), which consists of
17 creditors who were cooperative members and suppliers of Debtors, holding unsecured claims and
18 willing to serve in a fiduciary capacity.

19 9. On April 1, 2020, the Court entered an Order Setting Deadline for Filing
20 of Rejection Claims [ECF No. 719] which set forth a deadline of April 30, 2020, for filing claims
21 arising from a rejected executory contract or lease (the "Rejection Claim Bar Date").

22 10. On April 1, 2020, the Court entered an Order Setting Deadline for Filing
23 Post-Petition Non-Professional Administrative Expense Claims [ECF No. 720] which set forth a
24 deadline of April 30, 2020, for filing claims arising from non-professional administrative
25 expenses as set forth in 11 U.S.C. § 503(b) incurred on or after the Petition Date and on or before
26 April 1, 2020 (the "Post-Petition Administrative Claim Bar Date").

1 11. The deadlines for the Initial Bar Dates, the Rejection Claim Bar Date, and
2 the Post-Petition Administrative Claim Bar Date have all expired.

3 12. On May 7, 2020, Debtors' filed their Motion for Entry of an Order
4 Approving (1) Omnibus Claims Objections Procedures and (2) Settlement Procedures [ECF
5 No. 797] (the "Claims Procedures Motion"), which set forth the procedures for filing omnibus
6 claims objections. On May 29, 2020, the Court entered an order approving the Claims
7 Procedures Motion [ECF No. 826].

8 13. On November 12, the Court entered the Order Confirming Debtors' and
9 the Committee's Second Amended Joint Plan of Liquidation [Docket No. 1057]. On November
10 30, 2020, Debtors' Plan of Liquidation went effective. *See* Docket No. 1078.

11 14. More than 1,000 proofs of claim have been filed in these Chapter 11 cases.
12 Debtors are in the process of reviewing and reconciling the filed proofs of claim. This process
13 includes identifying particular categories of claims that may be targeted for disallowance,
14 reduction and allowance, or reclassification.

15 15. As part of their ongoing review and as described in the White Declaration,
16 Debtors have reviewed the proofs of claim listed on **Schedules 1, 2, 3, and 4** to the attached
17 proposed order, and have concluded that each such claim appropriately is objected to on the basis
18 set forth below.

19 **RELIEF REQUESTED**

20 16. Debtors seek an order of this Court, pursuant to 11 U.S.C. § 502 and
21 Rule 3007, disallowing or allowing each proof of claim as set forth below and listed on
22 **Schedules 1, 2, 3, and 4** to the attached proposed order.

23 **OBJECTION TO CLAIMS**

24 **Satisfied Claims**

25 17. Debtors object to the claims listed on **Schedule 1** to the attached proposed
26 order under the "Claim to be Disallowed" column (collectively, the "Satisfied Claims") as claims

1 for which Debtors are not liable because, before or since the proof of claim was filed, Debtors
2 have paid the full amount or otherwise satisfied the claim.

3 18. Failure to disallow the Satisfied Claims in their entirety would result in the
4 applicable claimants receiving an unwarranted recovery against Debtors' estates to the detriment
5 of creditors in these Chapter 11 cases. Accordingly, Debtors seek the entry of an order
6 disallowing each Satisfied Claim.

7 **Non-Debtor Claims**

8 19. Debtors object to the claims listed on **Schedule 2** to the attached proposed
9 order under the "Claim to be Disallowed" column as claims for which Debtors are not liable
10 (collectively, the "Non-Debtor Claims").

11 20. Debtors are not liable for the Non-Debtor Claims because they are claims
12 filed by Debtors' former employees that should be directed to the claimant's retirement
13 administrator, to workers' compensation insurance or other insurance provider, and/or to the
14 Pension Benefit Guaranty Corporation.

15 21. These Non-Debtor Claims are thus incorrectly filed in these chapter 11
16 cases and are not supported by Debtors' books and records. Failure to disallow the Non-Debtor
17 Claims in their entirety would result in the applicable claimants receiving an unwarranted
18 recovery from Debtors' estates to the detriment of Debtors' creditors. Accordingly, Debtors seek
19 the entry of an order disallowing each Non-Debtor Claim.

20 **Untimely Claims**

21 22. Debtors object to the claims listed on **Schedule 3** to the attached proposed
22 order under the "Claim to be Disallowed" column (collectively, the "Untimely Claims") as
23 claims for which Debtors are not liable because the proof of claim was filed after the expiration
24 of the Initial Bar Dates, the Rejection Claim Bar Date, and/or the Post-Petition Administrative
25 Claim Bar Date, whichever is applicable to each Untimely Claim, and the Untimely Claims do
26 not amend timely filed claims.

1 23. Failure to disallow the Untimely Claims in their entirety would result in
2 the applicable claimants receiving an unwarranted recovery against Debtors' estates to the
3 detriment of creditors in these chapter 11 cases. Accordingly, Debtors seek the entry of an order
4 disallowing each Untimely Claim. For the avoidance of doubt, this Objection objects only to
5 each Untimely Claim listed in **Schedule 3** in the "Claim to Be Disallowed" column—if the
6 claimant filed a different proof of claim timely, or is listed on Debtors' schedules and statements
7 as being owed a debt, Debtors do not object to those other claims.

8 **Reduced Claims**

9 24. Debtors object to the claims listed on **Schedule 4** to the attached proposed
10 order under the "Claim to be Disallowed" column (collectively, the "Reduced Claims") should
11 be allowed as general unsecured claims in the listed amount on **Schedule 4** under the "Allowed
12 Amount Per Debtors' Books & Records" column (the "Reduced Amounts").

13 25. For each Reduced Claim, the amount stated on the filed proof of claim is
14 not supported by Debtors' books and records. Accordingly, the Reduced Claims should be
15 allowed in the Reduced Amounts, which reflect the correct amount for each Reduced Claim as
16 shown in Debtors' books and records. Therefore, KCC, Debtors' official court-appointed notice
17 and claims agent, should be authorized to enter the Reduced Amounts for the Reduced Claims on
18 the official claims register for these chapter 11 cases.

19 26. Failure to allow the Reduced Claims in the Reduced Amounts listed on
20 **Schedule 4** would result in the applicable claimants receiving an unwarranted recovery against
21 Debtors' estates to the detriment of creditors in these Chapter 11 cases. Accordingly, Debtors
22 seek the entry of an order allowing each Reduced Claim in the Reduced Amount listed on
23 **Schedule 4**.

24 **Declaration in Support of Objection**

25 27. In support of this Objection, Debtors submit the White Declaration, which
26 is attached as **Exhibit 2**.

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6

2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6

6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6

7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6

- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6

3
4
5
6
7
8
9
10
11
12
13
14
15
16

4
5
6
7
8
9
0
1
2
3
4
5
6

6
7
8
9
10
11
12
13
14
15
16

7
8
9
0
1
2
3
4
5
6

EXHIBIT 1

PROPOSED FORM OF ORDER

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re

North Pacific Cannery & Packers, Inc.,
Hermiston Foods, LLC, and NPCP Quincy,
LLC,

Debtors.

Case No. 19-62584-pcm11
LEAD CASE

(Jointly Administered with Case
Nos. 19-33102-pcm11 and
19-33103-pcm11)

**ORDER GRANTING DEBTORS'
FIFTH OMNIBUS OBJECTION TO
CLAIMS (SATISFIED, NON-
DEBTOR, UNTIMELY, AND
REDUCED CLAIMS)**

THIS MATTER having come before the Court upon Debtors' Fifth Omnibus Objection to Claims (Satisfied, Non-Debtor, Untimely, and Reduced Claims) (the "Objection") [ECF No. ____], the Court having jurisdiction to consider the Objection and the relief requested therein pursuant to 11 U.S.C. § 502 and Rule 3007, and due and adequate notice of the Objection having been given under the circumstances, and the Court being duly advised in the premises and finding good cause; now, therefore;

IT IS HEREBY ORDERED that:

1. The Objection is granted.

Page 1 of 3 - ORDER GRANTING DEBTORS' FIFTH OMNIBUS OBJECTION TO CLAIMS (SATISFIED, NON-DEBTOR, UNTIMELY, AND REDUCED CLAIMS)

Tonkon Torp LLP
888 SW Fifth Ave., Suite 1600
Portland, OR 97204
503.221.1440

Case 19-62584-pcm11 Doc 1092 Filed 12/14/20

2. Capitalized terms not otherwise defined herein shall have the meaning ascribed to such terms in the Objection.

3. The Satisfied Claims listed on **Schedule 1** hereto under the column titled “Claim to Be Disallowed” are disallowed in their entirety.

4. The Non-Debtor Claims listed on **Schedule 2** hereto under the column titled “Claim to Be Disallowed” are disallowed in their entirety.

5. The Untimely Claims listed on **Schedule 3** hereto under the column titled “Claim to Be Disallowed” are disallowed in their entirety.

6. The Reduced Claims listed on **Schedule 4** hereto are allowed in the Reduced Amount listed under the column “Allowed Amount Per Debtors’ Books & Records.”

7. Nothing in the Objection or this Order constitutes a waiver of Debtors’ rights to object to any claims not previously disallowed or to assert any claims, counterclaims, rights of offset or recoupment, or any other claims against the claimants listed on **Schedules 1, 2, 3, and 4** to this Order, all of which rights are expressly preserved.

8. Pursuant to this Order, KCC, Debtors’ court-appointed notice and claims agent, is authorized and directed to reflect on the official claims register in these Chapter 11 cases that the claims listed on **Schedules 1, 2, and 3** are disallowed, and that the claims listed on **Schedule 4** are allowed in the Reduced Amounts listed under the column “Allowed Amount Per Debtors’ Books & Records.”

9. This Court shall retain jurisdiction with respect to any matters, claims, rights, or disputes arising from or related to the Objection or the implementation of this Order.

#

I certify that I have complied with the requirements of LBR 9021-1(a).

Presented by:

TONKON TORP LLP

By

Albert N. Kennedy, OSB No. 821429
Michael W. Fletcher, OSB No. 010448
Ava L. Schoen, OSB No. 044072
Danny Newman, OSB No. 200518
888 S.W. Fifth Avenue, Suite 1600
Portland, OR 97204-2099
Telephone: 503-221-1440
Facsimile: 503-274-8779
E-mail: al.kennedy@tonkon.com
michael.fletcher@tonkon.com
ava.schoen@tonkon.com
danny.newman@tonkon.com

Attorneys for Debtors

SCHEDULE 1

SCHEDULE 1
SATISFIED CLAIMS

Claim To Be Disallowed*	Creditor Name	Creditor Address (as listed on Proof of Claim)	Claim Amount	Debtor Name
<u>690</u>	Bi Rite Supermarkets Inc.	4676 Eric Ave. SW, PO Box 3, Navarre OH 44662	\$1,000.00	North Pacific Cannery & Packers, Inc.
<u>951</u>	Connell Oil, Inc.	Leavy Schultz Davis, P.S., 2415 West Falls Avenue, Kennewick WA 99336	\$838.68	NPCP Quincy, LLC
<u>886</u>	Franchise Tax Board	Bankruptcy Section MS A340, PO Box 2952, Sacramento CA 95812-2952	\$840.47	North Pacific Cannery & Packers, Inc.
<u>355</u>	Michigan Freeze Pack	Larissa Vanderputte, 835 S Griswold St, PO Box 30, Hart MI 49420	\$17,778.50	North Pacific Cannery & Packers, Inc.
<u>132</u>	NELSON-JAMESON, INC	PO BOX 1147, MARSHFIELD WI 54449	\$197.25	NPCP Quincy, LLC
<u>264</u>	PEARSON PACKAGING SYSTEMS	8120 W SUNSET HWY, SPOKANE WA 99224	\$284.11	NPCP Quincy, LLC
<u>952</u>	Professional Interpreters, Inc.	PO Box 7578, Salem OR 97303	\$1,450.00	North Pacific Cannery & Packers, Inc.
<u>93</u>	VULCAN ELECTRIC CO	28 ENDFIELD ST, PORTER ME 04068	\$1,464.50	North Pacific Cannery & Packers, Inc.

* Duplicative Proof of Claim Nos. reflect claims with secured, priority, and/or unsecured portions.
Copies of all filed claims can be viewed at: <http://www.kccllc.net/norpacfoods/register>

SCHEDULE 2

SCHEDULE 2
NON-DEBTOR CLAIMS

Claim To Be Disallowed*	Creditor Name	Creditor Address (as listed on Proof of Claim)	Claim Amount	Nature	Debtor Name
726	Bothum, Cydney	1515 E Highland, Hermiston OR 97838	\$8,823.76	Priority	North Pacific Cannery & Packers, Inc.
687	CHRISTIANSEN, ARTHUR	1287 SIERRA CT, STAYTON OR 97383-1194	\$84,000.00	Priority	North Pacific Cannery & Packers, Inc.
512	Dean M. Christiansen	11622 Shaff Rd SE, Aumsville OR 97325	UNLIQUIDATED	Priority	North Pacific Cannery & Packers, Inc.
165	DUNN, SHERI	320 E LAUREL AVE, GILBERT AZ 85234	\$76,502.77	Priority	North Pacific Cannery & Packers, Inc.
204	Hector, Linda M	PO Box 392, Soap Lake WA 98851	\$61,645.56	General Unsecured	North Pacific Cannery & Packers, Inc.
145	HEILMAN, RONALD	PO BOX 584, EPHRATA WA 98823	\$6,794.97	Priority	North Pacific Cannery & Packers, Inc.
456	KING, BARBARA M	10619 NW 19TH AVE, VANCOUVER WA 98685	\$52,000.00	Priority	North Pacific Cannery & Packers, Inc.
585	MAGNUSON, BRYAN	1630 BARNES ROAD S, SALEM OR 97306	\$93,089.59	General Unsecured	North Pacific Cannery & Packers, Inc.
583	Michael Wright Magnuson	155 SE 14th Pl, Warrenton OR 97146	\$90,764.34	General Unsecured	North Pacific Cannery & Packers, Inc.
746	NEWTSON, KENNETH	C/O YELA FIDUCIARY SERVICES, LLC (FORMERLY FARLEY PLAZA LLC), P.O. BOX 16518, PORTLAND OR 97292	\$69,063.00	Priority	North Pacific Cannery & Packers, Inc.
230	Oshea, Brian J	10 Wiskey Ridge Lane, Leavenworth WA 98826	\$151,704.00	Priority	North Pacific Cannery & Packers, Inc.
741	Quality Products	Brian Zielinski, 12423 River Rd NE, Gervais OR 97026	\$19,918.61	General Unsecured	North Pacific Cannery & Packers, Inc.
371	RENN, SARA	715 1ST AVE SW, QUINCY WA 98848	\$23,431.72	Priority	NPCP Quincy, LLC
319	SANCHEZ, OFELIA	505 I ST SW, QUINCY WA 98848	UNLIQUIDATED	Priority	NPCP Quincy, LLC
319	SANCHEZ, OFELIA	505 I ST SW, QUINCY WA 98848	\$7,576.81	General Unsecured	NPCP Quincy, LLC
756	Toni R Jones	1140 View Dr. NW, Salem OR 97304	\$225,000.00	Priority	North Pacific Cannery & Packers, Inc.
267	ZWICKER, PHYLLIS	160 KENWOOD AVE NE, SALEM OR 97301	\$581.56	Secured	North Pacific Cannery & Packers, Inc.

* Duplicative Proof of Claim Nos. reflect claims with secured, priority, and/or unsecured portions.
Copies of all filed claims can be viewed at: <http://www.kccllc.net/norpacfoods/register>

SCHEDULE 3

SCHEDULE 3
UNTIMELY CLAIMS

Claim To Be Disallowed*	Creditor Name	Creditor Address (as listed on Proof of Claim)	Claim Amount	Nature	Debtor Name
821	BJK Truck Parts, LLC	Kenneth Miller, Miller Mertens Comfort PLLC, 1020 N Center Pkwy Suite B, Kennewick WA 99336	\$740.95	General Unsecured	Hermiston Foods, LLC
821	BJK Truck Parts, LLC	Kenneth Miller, Miller Mertens Comfort PLLC, 1020 N Center Pkwy Suite B, Kennewick WA 99336	\$86.71	Admin Priority	Hermiston Foods, LLC
814	Boiler and Combustion Service, a Division of Northwest Control Company Inc	Rachel Harris, 8750 SE McLoughlin Blvd, Milwaukie OR 97222	\$3,972.94	General Unsecured	North Pacific Cannery & Packers, Inc.
760	Bunzl Distribution California LLC	Shannon Weick, 4501 West Valley Hwy E Ste A, Sumner WA 98390	\$8,731.86	Admin Priority	North Pacific Cannery & Packers, Inc.
760	Bunzl Distribution California LLC	Shannon Weick, 4501 West Valley Hwy E Ste A, Sumner WA 98390	\$8,731.86	Priority	North Pacific Cannery & Packers, Inc.
760	Bunzl Distribution California LLC	Shannon Weick, 4501 West Valley Hwy E Ste A, Sumner WA 98390	\$843.64	General Unsecured	North Pacific Cannery & Packers, Inc.
929	Ceridian HCM	Jennifer Glass, 3311 E. Old Shakopee Rd, Bloomington MN 55425	\$5,838.22	General Unsecured	North Pacific Cannery & Packers, Inc.
758	COLUMBIA CORRUGATED BOX	12777 SW TUALATIN-SHERWOOD RD, TUALATIN OR 97062	\$6,886.10	General Unsecured	North Pacific Cannery & Packers, Inc.
758	COLUMBIA CORRUGATED BOX	12777 SW TUALATIN-SHERWOOD RD, TUALATIN OR 97062	\$3,540.33	Admin Priority	North Pacific Cannery & Packers, Inc.
938	Family Foods LLC	Erik Crocitto, 15 OLD SHERMAN TPKE, DANBURY CT 06810	\$564.14	General Unsecured	North Pacific Cannery & Packers, Inc.
948	Francisco Garibay	1029 Neptune Ct SE, Salem OR 97317	\$529.00	General Unsecured	North Pacific Cannery & Packers, Inc.
810	JB Hunt Transport	Erica Hayes, 615 JB Hunt Corp Dr, Lowell AR 72745	\$161,190.73	General Unsecured	North Pacific Cannery & Packers, Inc.
926	Klarquist Sparkman LLP	121 SW Salmon Street, Suite 1600, Portland OR 97204	\$1,350.00	Admin Priority	North Pacific Cannery & Packers, Inc.

* Duplicative Proof of Claim Nos. reflect claims with secured, priority, and/or unsecured portions.
Copies of all filed claims can be viewed at: <http://www.kccllc.net/norpacfoods/register>

SCHEDULE 3
UNTIMELY CLAIMS

Claim To Be Disallowed*	Creditor Name	Creditor Address (as listed on Proof of Claim)	Claim Amount	Nature	Debtor Name
926	Klarquist Sparkman LLP	121 SW Salmon Street, Suite 1600, Portland OR 97204	\$125.00	General Unsecured	North Pacific Cannery & Packers, Inc.
820	Medelez, Inc.	Kenneth Miller, Miller Mertens Comfort PLLC, 1020 N Center Pkwy Suite B, Kennewick WA 99336	\$59,844.83	General Unsecured	North Pacific Cannery & Packers, Inc.
895	Panago Pizza Inc	33149 Mill Lake Road, Abbotsford BC V2S 2A4	\$2,046.00	General Unsecured	North Pacific Cannery & Packers, Inc.
1025	PECO Pallet Inc.	Tom Gerardi, 50 S Buckhout Street, Suite 301, Irvington NY 10533	\$24,923.78	General Unsecured	North Pacific Cannery & Packers, Inc.
1025	PECO Pallet Inc.	Tom Gerardi, 50 S Buckhout Street, Suite 301, Irvington NY 10533	\$10,989.18	Admin Priority	North Pacific Cannery & Packers, Inc.
776	RUBY+SOLBERG LLC	10117 SE SUNNYSIDE RD #F560, CLACKAMAS OR 977015	\$4,276.32	General Unsecured	North Pacific Cannery & Packers, Inc.
1089	Sierra Springs	Freda Williams, 6750 Discovery Blvd, 0, Mableton GA 30126	\$1,633.93	General Unsecured	North Pacific Cannery & Packers, Inc.
1037	The CORE Group	WFM, Inc., a CORE Group Co., 5201 West Laurel Street, Tampa FL 33607	\$3,568.27	Priority	North Pacific Cannery & Packers, Inc.
872	TRIANGLE PACKAGE MACHINERY COMPANY	ACCOUNTS RECEIVABLE, 6655 W DIVERSEY AVE, CHICAGO IL 60707-2293	\$23,196.72	General Unsecured	North Pacific Cannery & Packers, Inc.
872	TRIANGLE PACKAGE MACHINERY COMPANY	ACCOUNTS RECEIVABLE, 6655 W DIVERSEY AVE, CHICAGO IL 60707-2293	\$4,962.93	Admin Priority	North Pacific Cannery & Packers, Inc.

* Duplicative Proof of Claim Nos. reflect claims with secured, priority, and/or unsecured portions.
Copies of all filed claims can be viewed at: <http://www.kccllc.net/norpacfoods/register>

SCHEDULE 4

SCHEDULE 4
REDUCED CLAIMS

Claim No.*	Creditor Name	Creditor Address (as listed on Proof of Claim)	Claim Amount	Nature	Debtor Name	Allowed Amount Per Debtors' Books & Records
295	Allen, Donald	6114 Summerside St SE, Salem OR 97306	\$3,562.00	Priority	North Pacific Cannery & Packers, Inc.	\$0.00
141	ALLIANCE SHIPPERS INC	PO BOX 827505, PHILADELPHIA PA 19182-7505	\$109,519.68	General Unsecured	North Pacific Cannery & Packers, Inc.	\$97,084.75
198	CREATION GARDENS INC.	2055 NELSON MILLER PARKWAY, LOUISVILLE KY 40223	\$19,422.48	General Unsecured	North Pacific Cannery & Packers, Inc.	\$0.00
74	Credit Analyst Corp. H.Q.	Sandra J. Sberna, 6035 Parkland Blvd, Cleveland OH 44124	\$515.00	General Unsecured	NPCP Quincy, LLC	\$0.00
247	DIAZ, ALONSO	131 C ST NE, QUINCY WA 98848	\$32,000.00	Priority	NPCP Quincy, LLC	\$0.00
116	Hagan, Richard	PO Box 422, Jefferson OR 97352	\$3,720.00	Priority	North Pacific Cannery & Packers, Inc.	\$0.00
555	Impact Sales & Marketing Impact Group	950 W Bannock St, Suite 500, Boise ID 83702	\$24,600.72	General Unsecured	North Pacific Cannery & Packers, Inc.	\$4,014.73
423	Lien Solutions	28 Liberty St., 42nd Floor, New York NY 10005	\$1,599.75	General Unsecured	North Pacific Cannery & Packers, Inc.	\$0.00
153	LYCO MANUFACTURING, INC	115 COMMERCIAL DR, PO BOX 31, COLUMBUS WI 53925-0031	\$3,216.00	Admin Priority	NPCP Quincy, LLC	\$0.00
432	Molly L Cardwell-Aiken	James Aiken, 1190 Joplin St S, Salem OR 97302	\$5,502.00	General Unsecured	North Pacific Cannery & Packers, Inc.	\$0.00
940	Motion Industries, Inc.	Nathan Q. Rugg, Barack Ferrazzano Kirschbaum & Nagelberg LLP, 200 West Madison Street, Suite 3900, Chicago IL 60606	\$125,069.04	Admin Priority	NPCP Quincy, LLC	\$0.00
19	MSC Industrial Supply Company	75 Maxess Road, Melville NY 11747	\$13,991.17	Admin Priority	North Pacific Cannery & Packers, Inc.	\$12,367.20
642	Mueller, Stephen	32157 Stanfield Meadows Rd, Stanfield OR 97875	\$13,650.00	Priority	North Pacific Cannery & Packers, Inc.	\$2,154.79
348	Multifrost	101 W Fir St, Othello WA 99344-1060	\$4,666.75	General Unsecured	North Pacific Cannery & Packers, Inc.	\$3,121.75
96	NORTH VALLEY MECHANICAL INC	118 RODEO TRAIL RD, PO BOX 1369, OKANOGAN WA 98840-8229	\$39,338.68	General Unsecured	NPCP Quincy, LLC	\$0.00
399	Reese Group Inc	Attn Rhonda Sweeney, PO Box 40423, Nashville TN 37204	\$11,631.79	General Unsecured	North Pacific Cannery & Packers, Inc.	\$5,469.43
199	RENEE AMEN	7200 DOMINION CIRCLE, COMMERCE CA 90040	\$2,379.52	General Unsecured	North Pacific Cannery & Packers, Inc.	\$0.00
292	SpartanNash Company	850 76th Street SW, Grand Rapids MI 49518	\$6,499.60	General Unsecured	North Pacific Cannery & Packers, Inc.	\$0.00

* Duplicative Proof of Claim Nos. reflect claims with secured, priority, and/or unsecured portions.
Copies of all filed claims can be viewed at: <http://www.kccllc.net/norpacfoods/register>

SCHEDULE 4
REDUCED CLAIMS

Claim No.*	Creditor Name	Creditor Address (as listed on Proof of Claim)	Claim Amount	Nature	Debtor Name	Allowed Amount Per Debtors' Books & Records
560	TACOMA SCREW PRODUCTS INC	PO BOX 35165, SEATTLE WA 98124-5165	\$17,432.93	General Unsecured	NPCP Quincy, LLC	\$13,237.42
375	UniPro Foodservice, Inc.	Tracy Britton, 2500 Cumberland Parkway, SE, Suite 600, Atlanta GA 30339	\$142,576.98	General Unsecured	North Pacific Cannery & Packers, Inc.	\$107,554.23
449	WEST FARMS INC	PO BOX 42, CRABTREE OR 97374	\$21,300.00	General Unsecured	North Pacific Cannery & Packers, Inc.	\$17,100.00

* Duplicative Proof of Claim Nos. reflect claims with secured, priority, and/or unsecured portions.
Copies of all filed claims can be viewed at: <http://www.kccllc.net/norpacfoods/register>

EXHIBIT 2

DECLARATION OF WILLIAM L. WHITE

1 Albert N. Kennedy, OSB No. 821429 (Lead Attorney)

Direct Dial: 503.802.2013

2 Facsimile: 503.972.3713

E-Mail: albert.kennedy@tonkon.com

3 Michael W. Fletcher, OSB No. 010448

Direct Dial: (503) 802-2169

4 Facsimile: (503) 972-3867

E-Mail: michael.fletcher@tonkon.com

5 Ava L. Schoen, OSB No. 044072

Direct Dial: (503) 802-2143

6 Facsimile: (503) 972-3843

E-Mail: ava.schoen@tonkon.com

7 Danny Newman, OSB No. 200518

Direct Dial: (503) 802-2089

8 Facsimile: (503) 274-8779

E-Mail: danny.newman@tonkon.com

9 TONKON TORP LLP

888 SW Fifth Avenue, Suite 1600

10 Portland, OR 97204-2099

11 Attorneys for Debtors

12
13 UNITED STATES BANKRUPTCY COURT

14 DISTRICT OF OREGON

15 In re

16 North Pacific Cannery & Packers, Inc.,
17 Hermiston Foods, LLC, and NPCP Quincy,
18 LLC,

19 Debtors.

Case No. 19-62584-pcm11

LEAD CASE

(Jointly Administered with Case
Nos. 19-33102-pcm11 and
19-33103-pcm11)

**DECLARATION OF WILLIAM L.
WHITE IN SUPPORT OF DEBTORS'
FIFTH OMNIBUS OBJECTION TO
CLAIMS (SATISFIED, NON-
DEBTOR, UNTIMELY, AND
REDUCED CLAIMS)**

22
23 I, William L. White, declare and say:

24 1. I am a Senior Director at SierraConstellation Partners LLC ("Sierra"), the
25 Chief Restructuring Officer for Debtors in the above-captioned matter, and make this
26

1 Declaration in Support of Debtors' Fifth Omnibus Objection to Claims (Untimely Claims), filed
2 contemporaneously herewith (the "Objection").

3 2. Capitalized terms not otherwise defined herein shall have the meaning
4 ascribed to such terms in the Objection.

5 3. In my capacity as Senior Director, I am one of the persons responsible for
6 overseeing the claims reconciliation and objection process in Debtors' Chapter 11 cases.
7 Debtors' ongoing claims reconciliation process involves the collective effort of a team of
8 employees of Sierra and Debtors, as well as Debtors' counsel, Tonkon Torp LLP, and Debtors'
9 notice and claims agent, KCC. All facts set forth in this Declaration are based on my personal
10 knowledge, my review of proofs of claim and other relevant documents, or information provided
11 by Debtors' employees and advisors, and, as to matters involving United States bankruptcy law,
12 rules, or other applicable laws, my reliance on the advice of counsel or other advisors to Debtors.
13 If I were called upon to testify, I could and would testify to each of the facts set forth herein.

14 **CLAIMS OBJECTION**

15 4. I, or one or more of Debtors' employees or advisors operating under my
16 supervision and/or at my direction, have reviewed the books and records, the schedules of assets
17 and liabilities and statements of financial affairs filed by each Debtor, each of the proofs of claim
18 identified in the Objection, the claims register, and the facts and circumstances set forth in the
19 Objection regarding such proofs of claim. We also prepared the schedule attached to the
20 proposed order, including the "Ground for Objection" column that provides the detailed reasons
21 for the objection. I adopt those "Ground for Objection" explanations into this Declaration.

22 5. Based on this review and preparation of the schedule, and upon
23 consultation with Debtors' counsel, I submit that the facts and circumstances set forth in the
24 Objection and the schedule are true and accurate to the best of my knowledge, information, and
25 belief, and the proofs of claim listed in the "Claim to be Disallowed" column on **Schedule 1**,
26

1 **Schedule 2**, and **Schedule 3** attached to the proposed order filed with the Objection should be
2 disallowed as set forth in the Objection and the schedule for the reasons stated in the Objection.
3 Moreover, the claims listed on **Schedule 4** to the attached proposed order under the “Claim to be
4 Disallowed” column (collectively, the “Reduced Claims”) should be allowed as general
5 unsecured claims in the listed amount on **Schedule 4** under the “Allowed Amount Per Debtors’
6 Books & Records” column (the “Reduced Amounts”). For each Reduced Claim, the amount
7 stated on the filed proof of claim is not supported by Debtors’ books and records. Accordingly,
8 the Reduced Claims should be allowed in the Reduced Amounts, which reflect the correct
9 amount for each Reduced Claim as shown in Debtors’ books and records.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 DATED this 14th day of December, 2020.

12
13 /s/William L. White

14 William L. White, Senior Director
15 SierraConstellation Partners LLC

16 009684\00004\11674988v1
17
18
19
20
21
22
23
24
25
26